

Davis+Gilbert LLP 1675 Broadway New York, NY 10019 212 468 4800 dglaw.com

February 13, 2024

Guy Cohen d 212.468.4853 gcohen@dglaw.com

Via ECF

Honorable P. Kevin Castel U.S. District Court for the Southern District of New York Courtroom 11D 500 Pearl St. New York, NY 10007-1312

Re: Wilder v. Hoiland, Case No. 1:22-cv-01254-PKC

Dear Judge Castel:

This firm represents defendant Sarah Hoiland in the above-referenced action, in which the Court recently granted summary judgment in Dr. Hoiland's favor. We write, pursuant to Paragraph 1.C of Your Honor's Individual Practices and Fed. R. Civ. P. 54(d), to request a 14-day extension of time for Dr. Hoiland to file her forthcoming motion for attorneys' fees and costs under Section 505 of the Copyright Act and Rule 54(d) (the "Fees Motion"). This is Dr. Hoiland's first request for an extension of time to submit the Fees Motion. Plaintiff consents to this adjournment, which will not impact any other deadlines because the case has been closed. (*See* ECF No. 86.)

Under Rule 54(d)(2)(B)(i), Dr. Hoiland's motion is due within fourteen days after the entry of judgment unless a court order provides otherwise. Because judgment was entered on February 2, Dr. Hoiland's current deadline to file the Fees Motion is February 16. The parties are in discussions to determine whether this matter can be settled without further Court proceedings, and the parties believe that a short extension of the current deadline will help facilitate those discussions. Therefore, Dr. Hoiland respectfully requests an extension of her deadline to file the Fees Motion from February 16, 2024 to March 1, 2024.

We thank the Court in advance for its consideration of this request.

Respectfully submitted,
/s/ Guy Cohen
Guy Cohen

cc: All counsel of record (via ECF)